

Pennsylvania Department of Health

STATEMENT OF DEFICIENCIES AND PLAN OF CORRECTION (POC)		(X1) PROVIDER/SUPPLIER/CLIA IDENTIFICATION NUMBER:  <b>390164</b>	(X2) MULTIPLE CONSTRUCTION:  A. BLDG: <u>00</u> B. WING: _____		(X3) DATE SURVEY COMPLETED:  <b>03/07/2023</b>
NAME OF PROVIDER OR SUPPLIER: <b>UPMC DIGESTIVE HEALTH AND ENDOSCOPY CENTER</b>		STREET ADDRESS, CITY, STATE, ZIP CODE: <b>1000 INTEGRITY DRIVE SUITE 110 PITTSBURGH, PA 15235</b>			
STATE LICENSE NUMBER: <b>14711501</b>					
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S 0000	INITIAL COMMENT	S 0000			
S 5559	<p>This report is the result of a State licensure survey conducted on March 7, 2023, at UPMC Digestive Health and Endoscopy Center. It was determined the facility was not in compliance with the requirements of the Pennsylvania Department of Health's Rules and Regulations for Ambulatory Care Facilities, Annex A, Title 28, Part IV, Subparts A and F, Chapters 551-573, November 1999.</p>	S 5559			
LABORATORY DIRECTOR'S OR PROVIDER/SUPPLIER REPRESENTATIVE'S SIGNATURE			TITLE:		(X6) DATE:

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S 5559	Continued from page 1  555.33 (d)(1) Anesthesia Policies and Procedures  555.33 Anesthesia policies and procedures  (d) Anesthesia procedures shall provide at least the following: (1) A patient requiring anesthesia shall have a pre-anesthesia evaluation by a practitioner, with appropriate documentation of pertinent information regarding the choice of anesthesia.  This REGULATION is not met as evidenced by:	S 5559	The deficiency was immediately reviewed with the Senior Director GI Services, Unit Director, Administrator, CRNA Clinical Director, and the UPMC Digestive Health and Endoscopy Center medical director to address the identified deficiency. Completed: 3/27/2023. Education: The deficiencies were reviewed with the UPMC Digestive Health and Endoscopy Center physicians, CRNAs, and nursing staff to address the identified deficiencies. Education will be provided to the UPMC Digestive Health and Endoscopy Center physicians, CRNAs, and nursing staff via email. Education will include the review of the Department of Anesthesiology Policy & Procedure Manual, UPMC Digestive Health and Endoscopy Center, section Pre-Anesthetic Evaluation regarding the revision of the policy that includes the requirement for the physician to review and sign off the pre-anesthesia evaluation completed	Completion Date: <b>05/25/2023</b> Status: <b>APPROVED</b> Date: <b>04/04/2023</b>	

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S 5559	Continued from page 2	S 5559	<p>by a certified nurse anesthetist via attestation on the Pre-Procedure History and Physical from. Additionally, education will be provided on the revised Pre-Procedure History and Physical Form that will include a required signature by the physician that attests that the pre-anesthesia evaluation completed by a certified nurse anesthetist was reviewed and concurred with.</p> <p>The education will be conducted by The Unit Director and Administrator of the UPMC Digestive Health and Endoscopy Center Completion date: 5/5/2023 Monitoring: The Unit Director and/or designee will monitor for compliance of the physician reviewing and concurring with the pre-anesthesia evaluation, completed by a certified nurse anesthetist, as evidence by the physician signature attestation on the Pre-Procedure History and Physical from.</p>		

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S 5559	Continued from page 3	S 5559	<p>The Unit Director and Administrator will review the results and take appropriate action needed.</p> <p>The Administrator and/or designee will audit 5 medical records weekly for 2 months or until sustainability is achieved.</p> <p>Reporting:</p> <p>On a weekly basis audit results will be shared Senior Director, medical director, and Unit Director for review and follow-up.</p> <p>On a bimonthly basis, compliance results will be shared at Medicine Quality &amp; Safety Cabinet, Surgical Quality &amp; Safety Cabinet, and monthly to the Executive Management Group</p> <p>The person responsible for overseeing the correction of this deficiency will be the Senior Director of GI Services</p> <p>Overall Completion date: May 25, 2023</p>		

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S 5559	<p>Continued from page 4</p> <p>Based on review of facility policy, review of medical records (MR), and interview with facility staff (EMP), it was determined that the facility failed to ensure that the pre-anesthesia evaluation was completed by a practitioner for ten of ten medical records reviewed (MR1, MR2, MR3, MR4, MR5, MR6, MR7, MR8, MR9, and MR10).</p> <p>Findings include:</p> <p>On March 7, 2023, review of facility policy, "Pre-Anesthetic Evaluation," last approved 07/01/2022, revealed, "...A preanesthetic evaluation will be performed and recorded in the patient's medical record prior to the first dose of drugs intended for the induction of anesthesia (except in emergency situations) by the responsible anesthesiologist or his/her designee, (CRNA, Resident, SRNA)...."</p> <p>On March 7, 2023, review of MR1, MR2, MR3,</p>	S 5559			

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S 5559	Continued from page 5  MR4, MR5, MR6, MR7, MR8, MR9, and MR10 revealed that the pre-anesthesia evaluation was completed by the certified nurse anesthetist. There was no practitioner sign off for the pre-anesthesia evaluation.  On March 7, 2023, at 11:00am, EMP1 confirmed the above findings.	S 5559			
S 6415		S 6415			

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S 6415	Continued from page 6  563.13 (c) Entries  563.13 Entire  (c) A single signature on the face sheet of a record does not suffice to authenticate the entire record. Each entry shall be individually authenticated.  This REGULATION is not met as evidenced by:	S 6415	The deficiency was immediately reviewed with the Senior Director GI Services, Unit Director, Administrator, and the UPMC Digestive Health and Endoscopy Center medical director to address the identified deficiency. Completed: 3/27/2023. Education The deficiencies were reviewed with the Digestive Health and Endoscopy Center physicians and nursing staff to address the identified deficiencies. Education will be provided to the Digestive Health and Endoscopy Center physicians and nursing staff via email on the revised Pre-Procedure History and Physical Form regarding removal of written orders from the form. Communication provided to the Digestive Health and Endoscopy Center physicians and nursing staff of the process that orders including pre-procedure, intra-procedure, post-procedure/discharge order/criteria will be entered through the electronic medical health record	Completion Date: <b>05/25/2023</b> Status: <b>APPROVED</b> Date: <b>04/04/2023</b>	

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S 6415	Continued from page 7	S 6415	<p>which are authenticated by the physician electronically.</p> <p>The education will be conducted by The Unit Director and Administrator.</p> <p>Completion date: 5/5/2023</p> <p>Monitoring:</p> <p>The Unit Director and or designee will monitor the entry of pre-procedure, intra-procedure, post-procedure/discharge order/criteria into the electronic medical health record and authentication by the physician electronically.</p> <p>The Unit Director and Administrator will review the results and take appropriate action needed.</p> <p>The Administrator will audit 5 medical records weekly for 2 months or until sustainability is achieved.</p> <p>Reporting:</p> <p>On a weekly basis audit results will be shared Senior Director, medical director and Unit Director for review and follow-up.</p> <p>On a bimonthly basis, compliance results will be shared at Medicine Quality &amp; Safety Cabinet, Surgical Quality &amp; Safety Cabinet, and</p>		



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S 6415	Continued from page 8	S 6415	monthly to the Executive Management Group The person responsible for overseeing the correction of this deficiency will be the Senior Director of GI Services Overall Completion date: May 25, 2023		

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S 6415	<p>Continued from page 9</p> <p>Based on review of facility policy, review of medical records (MR), and interview with facility staff (EMP), it was determined that the facility failed to ensure that each individual entry was individually authenticated for ten out of ten medical records reviewed (MR1, MR2, MR3, MR4, MR5, MR6, MR7, MR8, MR9, and MR10).</p> <p>Findings include:</p> <p>A review of MR1 on March 7, 2023, revealed that the form "Pre-Procedure History and Physical &amp; Physician Orders" is used for the Pre-Procedure History and Physical, Pre-Procedure Orders, Intra-Procedure Orders, Post-Procedure Orders, and Discharge Orders/Criteria. The entries on the form failed to be individually authenticated.</p> <p>A review of MR2 on March 7, 2023, revealed that the form "Pre-Procedure History and Physical &amp; Physician Orders" is used for the Pre-Procedure History and Physical, Pre-Procedure Orders,</p>	S 6415			

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S 6415	<p>Continued from page 10</p> <p>Intra-Procedure Orders, Post-Procedure Orders, and Discharge Orders/Criteria. The entries on the form failed to be individually authenticated.</p> <p>A review of MR3 on March 7, 2023, revealed that the form "Pre-Procedure History and Physical &amp; Physician Orders " is used for the Pre-Procedure History and Physical, Pre-Procedure Orders, Intra-Procedure Orders, Post-Procedure Orders, and Discharge Orders/Criteria. The entries on the form failed to be individually authenticated on.</p> <p>A review of MR4 on March 7, 2023, revealed that the form "Pre-Procedure History and Physical &amp; Physician Orders " is used for the Pre-Procedure History and Physical, Pre-Procedure Orders, Intra-Procedure Orders, Post-Procedure Orders, and Discharge Orders/Criteria. The entries on the form failed to be individually authenticated on.</p> <p>A review of MR5 on March 7, 2023, revealed that the form "Pre-Procedure History and Physical &amp;</p>	S 6415			

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S 6415	<p>Continued from page 11</p> <p>Physician Orders " is used for the Pre-Procedure History and Physical, Pre-Procedure Orders, Intra-Procedure Orders, Post-Procedure Orders, and Discharge Orders/Criteria. The entries on the form failed to be individually authenticated.</p> <p>A review of MR6 on March 7, 2023, revealed that the form "Pre-Procedure History and Physical &amp; Physician Orders " is used for the Pre-Procedure History and Physical, Pre-Procedure Orders, Intra-Procedure Orders, Post-Procedure Orders, and Discharge Orders/Criteria. The entries on the form failed to be individually authenticated.</p> <p>A review of MR7 on March 7, 2023, revealed that the form "Pre-Procedure History and Physical &amp; Physician Orders" is used for the Pre-Procedure History and Physical, Pre-Procedure Orders, Intra-Procedure Orders, Post-Procedure Orders, and Discharge Orders/Criteria. The entries on the form failed to be individually authenticated.</p>	S 6415			

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S 6415	<p>Continued from page 12</p> <p>A review of MR8 on March 7, 2023, revealed that the form "Pre-Procedure History and Physical &amp; Physician Orders" is used for the Pre-Procedure History and Physical, Pre-Procedure Orders, Intra-Procedure Orders, Post-Procedure Orders, and Discharge Orders/Criteria. The entries on the form failed to be individually authenticated.</p> <p>A review of MR9 on March 7, 2023, revealed that one form "Pre-Procedure History and Physical &amp; Physician Orders " is used for the Pre-Procedure History and Physical, Pre-Procedure Orders, Intra-Procedure Orders, Post-Procedure Orders, and Discharge Orders/Criteria. The entries on the form failed to be individually authenticated.</p> <p>A review of MR10 on March 7, 2023, revealed that one form "Pre-Procedure History and Physical &amp; Physician Orders" is used for the Pre-Procedure History and Physical, Pre-Procedure Orders, Intra-Procedure Orders, Post-Procedure Orders, and Discharge Orders/Criteria. The entries on the</p>	S 6415			

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S 6415	Continued from page 13  form failed to be individually authenticated.  On March 7, 2023, at 9:30am, EMP1 confirmed that the physician signs the form at the end of the procedure and that not every entry is individually authenticated.  On March 7, 2023, at 11:00am, EMP1 confirmed the above findings.	S 6415			



# Certified End Page

**UPMC DIGESTIVE HEALTH AND ENDOSCOPY CENTER**

**STATE LICENSE NUMBER: 14711501**

**SURVEY EXIT DATE: 03/07/2023**

**I Certify This Document to be a True and Correct Statement of Deficiencies and  
Approved Facility Plan of Correction for the Above-Identified Facility Survey**

A handwritten signature in black ink that reads "Jeane Parisi".

*Jeane Parisi*  
*Deputy Secretary for Quality Assurance*

A handwritten signature in black ink that reads "Debra L. Bogen MD".

*Debra L. Bogen, MD, FAAP*  
*Acting Secretary of Health*



THIS IS A CERTIFICATION PAGE

**PLEASE DO NOT DETACH**

THIS PAGE IS NOW PART OF THIS SURVEY